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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JOHN MEGGS, Individually,
12 Plaintiff,
13 vs.
14 UNIVERSITY SQUARE GROUP ,LTD.,
15 a Nevada Limited Liability Company,
16 Defendant.

CASE NO. 2:14-cv-01800-JAD-VCF

STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE DEADLINE IN
THE DEFENDANT'S TIME TO
RESPOND TO COMPLAINT
[SECOND REQUEST]

16 Defendant, UNIVERSITY SQUARE GROUP, LTD., through its attorney of record,
17 Molly M. Rezac of Gordon Silver, and Plaintiff, JOHN MEGGS, by and through his attorneys of
18 record, Robert P. Spretnak of the Law Offices of Robert P. Spretnak, and Brandon A. Rotbart of
19 Fuller, Fuller & Associates, hereby agree and stipulate to allow for a second 20-day extension of
20 time to respond to complaint up to and including April 23, 2015.

21 The current response date is April 3, 2015. This stipulation is requested so that the
22 defendant can research the facts and circumstances underlying the claims made in the complaint,
23 explore settlement of this ADA accessibility matter, and is not intended for delay. The Plaintiff

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1 completed an inspection on March 23, 2015 and a report is forthcoming that will further the
2 parties settlement discussions.

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6 Dated this 3rd day of April, 2015.

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/s/ Molly M. Rezac

MOLLY M. REZAC

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Attorney for Defendant

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Dated this 3rd day of April, 2015.

/s/ Robert P. Spretnak

ROBERT P. SPRETNAK

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-and-

/s/ Brandon A. Rotbart

BRANDON A. ROTBART, *pro hac vice*

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Attorneys for Plaintiff

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21 **ORDER**

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Pursuant to the foregoing stipulation by and between the parties, IT IS SO ORDERED.

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DATED this 6th day of April, 2015.

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U.S. Magistrate JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on this 3rd day of April, 2015, I served a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DEADLINE IN THE DEFENDANT'S TIME TO RESPOND TO COMPLAINT [SECOND REQUEST]** by:

____ serving the following parties electronically through CM/ECF as set forth below:

faxing a copy to the numbers below;

XX depositing a copy in the United States mail, first class postage fully prepaid to the

persons and addresses listed below:

Robert P. Spretnak
Law Offices of Robert P. Spretnak
8275 S. Eastern Ave., Suite 200
Las Vegas, NV 89123

Brandon A. Rotbart
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12000 Biscayne Blvd., Suite 502
N. Miami, FL 33181

/s/ M'Chele LaBelle
An employee of Gordon Silver